

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona  
Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

SIPA LIQUIDATION

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-05124 (SMB)

Plaintiff,

v.

THE LAWRENCE J. RYAN AND THERESA R.  
RYAN REVOCABLE LIVING TRUST, THE  
LAWRENCE J. RYAN BY-PASS TRUST  
UNDER DECLARATION OF TRUST DATED,  
11/20/1991, and THERESA R. RYAN, individually  
and in her capacities as trustee of THE  
LAWRENCE J. RYAN AND THERESA R.

RYAN REVOCABLE LIVING TRUST  
and THE LAWRENCE J. RYAN BY-PASS  
TRUST UNDER DECLARATION OF TRUST  
DATED 11/20/1991,

Defendants.

**CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 21, 2015.
2. Fact Discovery shall be completed by: April 7, 2017.
3. The Disclosure of Case-in-Chief Experts shall be due: June 27, 2017.
4. The Disclosure of Rebuttal Experts shall be due: August 28, 2017.
5. The Deadline for Completion of Expert Discovery shall be: September 25, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before October 2, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before October 16, 2017.
8. The Deadline for Conclusion of Mediation shall be: On or before February 13, 2018.

Dated: New York, New York  
October 16, 2015

BAKER & HOSTETLER LLP

Of Counsel:

**BAKER HOSTETLER LLP**  
811 Main, Suite 1100  
Houston, Texas 77002  
Telephone: (713) 751-1600  
Facsimile: (713) 751-1717  
Dean D. Hunt  
Email: dhunt@bakerlaw.com

By: /s/ Nicholas J. Cremona

David J. Sheehan  
Nicholas J. Cremona  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and for the Estate of Bernard  
L. Madoff*